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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**ST. MATTHEW'S UNIVERSITY
(CAYMAN) LTD., a Cayman Islands
company,**

Plaintiff,

v.

**SABA UNIVERSITY SCHOOL OF
MEDICINE FOUNDATION, a Netherland-
Antilles company; MEDICAL
UNIVERSITY OF THE AMERICAS, a St.
Kitts & Nevis company; EDUCATION
INFORMATION CONSULTANTS, INC., a
Massachusetts corporation;
EDUCATIONAL INTERNATIONAL
CONSULTANTS, LLC, a Massachusetts
limited liability company; PATRICIA L.
HOUGH, M.D. an individual, and d.b.a.
"Saba University School of Medicine";
DAVID L. FREDRICK, an individual;
PANKAJ DESAI, M.D., an individual;
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL
GRADUATES, INC., a Nevada
corporation, a.k.a. "aaimg@yahoo.com";
THOMAS MOORE, M.D. a.k.a.
"presaaimg@hotmail.com" and
"crocdoc2004@netzero.net," an
individual; SARAH B. WEINSTEIN a.k.a.
"execsecaaimg@hotmail.com," an
individual; RACHAEL E. SILVER, an
individual; and DIEDRE MOORE, an
individual,**

Defendants.

Case No. CV-S-05-0848-BES

**JOINT MOTION FOR STAY OF ALL
PROCEEDINGS**

1 Plaintiff in the above-captioned matter, St. Matthew's University (Cayman),
 2 Ltd. ("SMU"), and defendants Saba University School of Medicine Foundation
 3 ("Saba University"); the Association of American Medical School Graduates, Inc.
 4 ("AAIMG"), Education Information Consultants, Inc. ("EIC, INC."); Educational
 5 International Consultants, LLC ("EIC, LLC"), David L. Fredrick, Patricia L. Hough,
 6 M.D., and Pankaj Desai, M.D. (the "Defendants") (together, the "Parties"), hereby
 7 jointly request this Court to stay all actions in light of pending settlement discussions,
 8 for a period of one hundred and twenty (120) days in accordance with the form of
 9 proposed order submitted herewith. In support of this motion, the Parties
 10 respectfully represent as follows:

11 1. SMU filed the within action in the United States District Court for the
 12 District of Nevada captioned St. Matthew's University (Cayman) Ltd v. SABA
 13 University School of Medicine Foundation et al, Civil Action No. CV-S-05-0848-RCJ
 14 (LRL) (the "Litigation"), and the Parties have been actively engaged in the
 15 prosecution of the claims and defenses presented in the Litigation since the
 16 inception of this matter;

17 2. The Parties have determined that it is their mutual best interest to
 18 engage in good faith settlement discussions with the goal of finally resolving and
 19 settling, once and for all, any and all of the claims and defenses presented in the
 20 Litigation on terms that are fair and just to all Parties;

21 3. In furtherance of this goal, the Parties wish to avoid the substantial
 22 cost and expense associated with continuing with this Litigation during the time that
 23 the Parties will be actively engaged in good faith settlement discussions;

24 4. The Parties represent that they have entered into a written standstill
 25 agreement pursuant to the terms of which each of the Parties has agreed, subject to
 26 this Court's approval, to suspend all further activities in connection with the
 27 prosecution or defense of this matter, including, without limitation, the filing of any
 28 motions, discovery, subpoena or service upon or the addition any parties to the

1 Litigation;

2 5. The Parties have additionally agreed that they will not commence or
3 prosecute, or cause to be commenced or prosecuted, any new or existing litigation
4 between any of the parties in any jurisdiction prior to the termination date of any stay
5 entered by the Court in this matter;

6 6. The Parties believe that a stay of these proceedings for a period of 120
7 days, upon the terms and conditions set forth in the attached proposed form of order
8 staying proceedings, will afford the Parties the best opportunity to resolve the claims
9 and defenses presented in the Litigation and to maximize the cost savings to the
10 Parties;

11 7. The Parties further represent that no party to this Litigation will be
12 prejudiced by the requested stay, and that the requested stay will serve the interests
13 of conserving judicial resources;

14 8. The Parties have agreed that the filing of this motion shall not be
15 deemed to operate as or effect a waiver of any claims or defenses that any party
16 was entitled to assert or has asserted prior to this motion, including, without
17 limitation, any and all defenses based on lack of personal jurisdiction.

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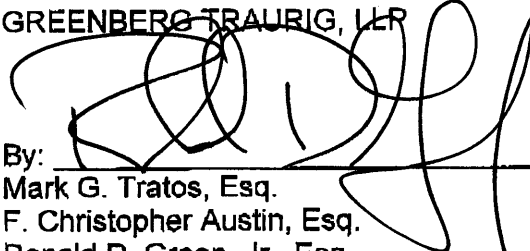
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1 WHEREFORE, the Parties respectfully request that this Court enter an order
2 staying these proceedings upon the terms and conditions reflected in the attached
3 proposed form of Order.

4 RESPECTFULLY SUBMITTED:

5 Dated: 9/13, 2006

GREENBERG TRAURIG, LLP



By:

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14 Dated: 9/13, 2006

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FOUNDATION, LTD., MEDICAL UNIVERSITY OF

THE AMERICAS, EDUCATION INFORMATION

CONSULTANTS, INC., EDUCATIONAL

INTERNATIONAL CONSULTANTS, LLC,

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